## IN THE CLAIMS

Please amend the claims as follows:

- 1-39. (Cancelled)
- 40. (Withdrawn) A method of forming a memory array on a substrate, the method comprising the steps of:

forming a first source/drain layer at a surface of the substrate;

forming a semiconductor epitaxial layer on the first source/drain layer;

forming a second source/drain layer at a surface of the epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming a first gate dielectric layer substantially adjacent to sidewall regions of the first troughs;

forming a first conductive layer in the first troughs;

removing a portion of the first conductive layer in the first troughs such that floating gate regions are formed along the sidewall regions therein and separated from the sidewall regions by the first gate dielectric layer;

etching a portion of the substrate underlying a portion of the first troughs between the floating gate regions;

forming a first integrate dielectric layer on exposed portions of the floating gate regions in the first troughs;

forming first gate lines in the underlying etched portion of the substrate between opposing floating gate regions in the first troughs; and

forming control gate regions in the first troughs between opposing floating gate regions and separated therefrom by the first integrate dielectric layer.

41. (Withdrawn) The method of claim 40, further comprising the steps of: etching, in a second direction that is substantially orthogonal to the first direction, a

plurality of substantially parallel second troughs in the epitaxial layer;

forming a second gate dielectric layer substantially adjacent to sidewall regions of the second troughs;

forming a second conductive layer in the second troughs;

removing a portion of the second conductive layer in the second troughs such that floating gate regions are formed along the sidewall regions therein and separated from the sidewall regions by the second gate dielectric layer;

forming a second integrate dielectric layer on exposed portions of the floating gate regions in the second troughs; and

forming control gate regions and second gate lines between opposing floating gate regions in the second troughs and separated from the floating gate regions in the second troughs by the second integrate dielectric layer.

### 42-44. (Cancelled)

(Withdrawn) The method of claim 41, wherein the method further includes: 45.

forming a thin silicon nitride oxidation barrier layer by chemical vapor deposition on the sidewall regions of the second troughs;

anisotropically etching the thin silicon nitride oxidation barrier layer to expose bottom portions of the second troughs;

forming a bottom insulation layer on the bottom portions of the second troughs by thermal oxidation; and

stripping the thin silicon nitride oxidation barrier layer from the sidewall regions of the second troughs by a brief phosphoric acid etch.

46. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer, the epitaxial layer being formed on the first source/drain layer and comprising P- silicon;

forming a thin layer of silicon dioxide on the second source/drain layer;

forming a layer of silicon nitride on the thin layer of silicon dioxide;

etching a plurality of substantially parallel troughs in the epitaxial laver;

forming at least two floating gate regions along sidewall regions of the troughs and separated from the sidewall regions by a gate dielectric layer;

forming gate lines between opposing floating gate regions in the troughs; and forming control gate regions in the troughs between opposing floating gate regions and separated therefrom by an intergate dielectric layer.

- (Withdrawn) The method of claim 46, wherein the forming of the first source/drain layer 47. includes forming the first source/drain layer with an approximate thickness between 0.2 microns and 0.5 microns.
- (Withdrawn) The method of claim 46, wherein the forming of the thin layer of silicon 48. dioxide includes forming the thin layer of silicon dioxide with an approximate thickness of 10 nanometers.
- 49. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate, the first source/drain layer comprising N+ silicon formed by epitaxial growth of silicon upon the substrate;

forming a semiconductor epitaxial layer on the first source/drain layer;

forming a second source/drain layer at a surface of the epitaxial layer by ionimplantation, the second source/drain layer comprising N+ silicon and having an approximate thickness of 150 nanometers;

forming a thin layer of silicon dioxide on the second source/drain layer, the thin layer of silicon dioxide having an approximate thickness of 10 nanometers;

forming a layer of silicon nitride on the thin layer of silicon dioxide, the layer of silicon nitride having an approximate thickness of 200 nanometers;

etching a plurality of substantially parallel troughs in the epitaxial layer;

forming at least two floating gate regions along sidewall regions of the troughs and separated from the sidewall regions by a gate dielectric layer;

forming gate lines between opposing floating gate regions in the troughs; and

forming control gate regions in the troughs between opposing floating gate regions and separated therefrom by an intergate dielectric layer.

- (Withdrawn) The method of claim 49, wherein the forming of the first source/drain layer 50. includes forming of the first source/drain layer with an approximate thickness between 0.2 microns and 0.5 microns.
- (Withdrawn) The method of claim 49, wherein the forming of the at least two floating 51. gate regions includes forming the at least two floating gate regions along the sidewall regions of the troughs and separated from the sidewall regions by the gate dielectric layer, the gate dielectric layer having an approximate thickness between 5 nanometers and 10 nanometers.

#### 52. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate, the substrate having a semiconductor-on-insulator portion, and the first source/drain layer comprising N+ silicon formed by ion-implantation of donor dopants into the substrate;

forming a semiconductor epitaxial layer on the first source/drain layer, the semiconductor epitaxial layer comprising P- silicon and having an approximate thickness of 0.6 microns;

forming a second source/drain layer at a surface of the epitaxial layer by ionimplantation, the second source/drain layer comprising N+ silicon and having an approximate thickness of 150 nanometers;

forming a thin layer of silicon dioxide on the second source/drain layer;

forming a layer of silicon nitride on the thin layer of silicon dioxide;

etching a plurality of substantially parallel troughs in the epitaxial layer;

forming at least two floating gate regions along sidewall regions of the troughs and separated from the sidewall regions by a gate dielectric layer;

forming gate lines between opposing floating gate regions in the troughs; and forming control gate regions in the troughs between opposing floating gate regions and separated therefrom by an intergate dielectric layer.

- 53. (Withdrawn) The method of claim 52, wherein the method further includes forming a conductive layer in the troughs.
- 54. (Withdrawn) The method of claim 53, wherein the method further includes: removing a portion of the conductive layer in the troughs; and etching a portion of the substrate underlying a portion of the troughs between the floating gate regions.
- 55. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate, the first source/drain layer comprising N+ silicon formed by ion-implantation of donor dopants into the substrate;

forming a second source/drain layer at a surface of an epitaxial layer, the epitaxial layer being formed on the first source/drain layer and comprising P- silicon;

forming a thin layer of silicon dioxide on the second source/drain layer;
forming a layer of silicon nitride on the thin layer of silicon dioxide;
etching a plurality of substantially parallel troughs in the epitaxial layer;
forming an insulating layer undercutting semiconductor regions between the troughs;
forming at least two floating gate regions along sidewall regions of the troughs and
separated from the sidewall regions by a gate dielectric layer;

forming gate lines between opposing floating gate regions in the troughs; and forming control gate regions in the troughs between opposing floating gate regions and separated therefrom by an intergate dielectric layer.

- 56. (Withdrawn) The method of claim 55, wherein the forming of the at least two floating gates includes forming the at least two floating gate regions along the sidewall regions of the troughs and separated from the sidewall regions by the gate dielectric layer, the gate dielectric layer having an approximate thickness between 5 nanometers and 10 nanometers.
- 57. (Withdrawn) The method of claim 55, wherein the forming of the control gate regions includes forming of the control gate regions in the troughs between opposing floating gate

regions and separated therefrom by the intergate dielectric layer, the intergate dielectric layer having an approximate thickness between 7 nanometers and 15 nanometers.

58. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer, the epitaxial layer being formed on the first source/drain layer;

etching a plurality of substantially parallel troughs in the epitaxial layer;

forming a thin silicon nitride oxidation barrier layer by chemical vapor deposition on sidewall regions of the troughs;

anisotropically etching the thin silicon nitride oxidation barrier layer to expose bottom portions of the troughs;

forming a bottom insulation layer on the bottom portions of the troughs by thermal oxidation;

forming at least two floating gate regions along sidewall regions of the troughs and separated from the sidewall regions by a gate dielectric layer; and

forming control gate regions in the troughs between opposing floating gate regions and separated therefrom by an intergate dielectric layer.

- 59. (Withdrawn) The method of claim 58, wherein the method further includes planarizing the first conductive layer by using a chemical mechanical polish.
- 60. (Withdrawn) The method of claim 58, wherein the method further includes stripping the thin silicon nitride oxidation barrier layer from the sidewall regions by a brief phosphoric acid etch.
- 61. (Withdrawn) The method of claim 58, wherein the forming of the first source/drain layer includes forming the first source/drain layer at the surface of the substrate, wherein the substrate is a bulk semiconductor.

## 62. (Currently Amended) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gates gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gates gate regions, the first control gate regions being separated from the first floating gates gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gates gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gates gate regions, the second control gate regions being separated from the second floating gates gate regions by a second intergate dielectric layer.

## 63. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming a first bottom insulation layer on bottom portions of the first troughs by thermal oxidation;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer.

- 64. (Withdrawn) The method of claim 63, wherein the method further includes forming a second bottom insulation layer on bottom portions of the second troughs by thermal oxidation.
- 65. (Currently Amended) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gates gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gates gate regions, the first control gate regions being separated from the first floating gates gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gates gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming a second intergate dielectric layer by thermal growth of silicon dioxide; and forming second control gate regions between opposing second floating gates gate regions, the second control gate regions being separated from the second floating gates gate regions by the second intergate dielectric layer.

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## 66. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming a second intergate dielectric layer by deposition of oxynitride by chemical vapor deposition;

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by the second intergate dielectric layer.

# 67. (Currently Amended) A method comprising:

forming a first source/drain layer at a surface of a substrate, wherein the forming of the first source/drain layer includes forming the first source/drain layer at the surface of the substrate, wherein the substrate is a bulk semiconductor;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gates gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gates gate regions, the first control gate regions being separated from the first floating gates gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gates gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gates gate regions, the second control gate regions being separated from the second floating gates gate regions by a second intergate dielectric layer.

## 68. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer, wherein the forming of the first floating gate regions includes forming the first floating gate regions along the sidewall regions of the first troughs and separated from the sidewall regions by the first gate dielectric layer, the first gate dielectric layer having an approximate thickness between 5 nanometers and 10 nanometers;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer.

## 69. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer, wherein the forming of the second floating gate regions includes forming the second floating gate regions along the sidewall regions of the second troughs and separated from the sidewall regions by the second gate dielectric layer, the second gate dielectric layer having an approximate thickness between 5 nanometers and 10 nanometers; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer.

## 70. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming a first gate dielectric layer along sidewall regions of the first troughs;

forming first floating gate regions along the sidewall regions of the first troughs and separated from the sidewall regions by the first gate dielectric layer, the first floating gate regions including a first conductive layer of N+ doped polysilicon;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer, and the first control gate regions including N+ doped polysilicon;

forming first gate lines in the first troughs between opposing first floating gate regions; etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

removing material at intersecting portions of first troughs and second troughs, thereby separating first floating gate regions into first isolated floating gates;

forming a second gate dielectric layer along sidewall regions of the second troughs;

forming second floating gate regions along the sidewall regions of the second troughs and separated from the sidewall regions by the second gate dielectric layer, the second floating gate regions including a second conductive layer of N+ doped polysilicon;

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer, and the second control gate regions including N+ doped polysilicon; and

forming second gate lines in the second troughs between opposing second floating gate regions.

### 71. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

### AMENDMENT AND RESPONSE UNDER 37 CFR § 1.111

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forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer, the first floating gate regions including a first conductive layer of N+ doped polysilicon;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer, the second floating gate regions including a second conductive layer of N+ doped polysilicon; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer.

### 72. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer, and the first control gate regions including N+ doped polysilicon;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer, and the second control gate regions including N+ doped polysilicon.

# 73. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

forming first gate lines in the first troughs between opposing first floating gate regions; etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer;

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer; and

forming second gate lines in the second troughs between opposing second floating gate regions.

### 74. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer, and the first control gate regions are formed together with first gate lines by depositing N+ polysilicon in the first troughs;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer, and the second control gate regions are formed together with second gate lines by depositing N+ polysilicon in the second troughs.

## 75. (Withdrawn) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming first floating gate regions along sidewall regions of the first troughs and separated from the sidewall regions by a first gate dielectric layer;

forming first control gate regions between opposing first floating gate regions, the first control gate regions being separated from the first floating gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

removing material at intersecting portions of first troughs and second troughs, thereby separating first floating gate regions into first isolated floating gates;

forming second floating gate regions along sidewall regions of the second troughs and separated from the sidewall regions by a second gate dielectric layer; and

forming second control gate regions between opposing second floating gate regions, the second control gate regions being separated from the second floating gate regions by a second intergate dielectric layer.

#### 76. (Currently Amended) A method comprising:

forming a first source/drain layer at a surface of a substrate;

forming a second source/drain layer at a surface of an epitaxial layer;

etching, in a first direction, a plurality of substantially parallel first troughs in the epitaxial layer;

forming a first gate dielectric layer along sidewall regions of the first troughs;

forming first floating gates gate regions along the sidewall regions of the first troughs and separated from the sidewall regions by the first gate dielectric layer;

forming first control gate regions between opposing first floating gates gate regions, the first control gate regions being separated from the first floating gates gate regions by a first intergate dielectric layer;

etching, in a second direction substantially orthogonal to the first direction, a plurality of substantially parallel second troughs in the epitaxial layer;

forming a second gate dielectric layer along sidewall regions of the second troughs;

forming second floating gates gate regions along the sidewall regions of the second troughs and separated from the sidewall regions by the second gate dielectric layer; and

forming second control gate regions between opposing second floating gates gate regions, the second control gate regions being separated from the second floating gates gate regions by a second intergate dielectric layer.

77-83. (Cancelled)